

VARNUM LLP  
Bridgewater Place, P.O. Box 352  
Grand Rapids, MI 49501-0352  
Mary Kay Shaver  
Bryan R. Walters (*pro hac vice* admission pending)  
Tel.: (616) 336-6000

*Attorneys for Summit Polymers, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

\_\_\_\_\_X

In re:

Case No. 05-44481-rdd

Chapter 11

DPH HOLDINGS CORP., et al.,

(Jointly Administered)

Debtors.

\_\_\_\_\_X

DELPHI CORPORATION, et al.,

Adv. Proc. No. 07-02661-rdd

Plaintiff,

v.

SUMMIT POLYMERS INC. ,

Defendant.

\_\_\_\_\_X

**SUMMIT POLYMERS, INC.'S REPLY IN SUPPORT OF MOTIONS TO DISMISS**

Summit Polymers, Inc. ("Defendant" or "Summit"), by and through its undersigned counsel, hereby joins and adopts the arguments set forth in the following replies in support of Motions to Dismiss (the "Replies") filed by:

*REPLY MEMORANDUM OF LAW IN SUPPORT OF MOTIONS OF AFFINA, GKN, MSX AND VALEO TO: (A) VACATE CERTAIN PRIOR ORDERS OF THE COURT; (B) DISMISS THE COMPLAINT WITH PREJUDICE; (C) AND DISMISS THE CLAIMS AGAINST CERTAIN DEFENDANTS NAMED IN THE COMPLAINT; AND (D) DISMISS CLAIMS BASED ON ASSUMPTION OF CONTRACTS; OR (E) IN THE ALTERNATIVE, TO REQUIRE PLAINTIFFS TO FILE A MORE DEFINITE STATEMENT (ADV. PRO. NO. 07-02534 (ROD))*

*REPLY OF HP ENTERPRISE SERVICES, LLC AND AFFILIATES IN SUPPORT OF THEIR  
MOTION FOR AN ORDER DISMISSING THE COMPLAINT WITH PREJUDICE, AND  
VACATING CERTAIN PRIOR ORDERS PURSUANT TO FED. R. CIV. P. 60 AND FED. R.  
BANKR. P. 9024 (ADV. PRO. NO. 07-02262 (ROD))*

*REPLY AND JOINDER IN FURTHER SUPPORT OF MOTION OF JOHNSON CONTROLS,  
JOHNSON CONTROLS BATTERY GROUP, JOHNSON CONTROLS GMBH & CO. KG AND  
JOHNSON CONTROLS, INC. TO: (A) VACATE CERTAIN PRIOR ORDERS OF THE COURT;  
(B) DISMISS THE COMPLAINT WITH PREJUDICE; OR (C) IN THE ALTERNATIVE, TO  
DISMISS THE CLAIMS AGAINST CERTAIN DEFENDANTS NAMED IN THE COMPLAINT  
AND TO REQUIRE PLAINTIFFS TO FILE A MORE DEFINITE STATEMENT (ADV. PRO. NO.  
07-02348 (ROD))*

*REPLY OF WAGNER-SMITH COMPANY TO REORGANIZED DEBTORS' OMNIBUS  
RESPONSE TO MOTIONS SEEKING, AMONG OTHER FORMS OF RELIEF, ORDERS TO  
VACATE CERTAIN PROCEDURAL ORDERS PREVIOUSLY ENTERED BY THIS COURT AND  
TO DISMISS THE AVOIDANCE ACTIONS AGAINST THE MOVING DEFENDANTS (ADV.  
PRO. NO. 07-02581 (ROD))*

as well as the replies submitted by the other defendants in the other adversary proceedings that  
have filed similar motions.

Defendant adopts and incorporates all of the arguments applicable to Defendant's  
circumstances as stated in the Replies and in the original Motion to Dismiss, which Defendant  
filed on April 20, 2010.

Grand Rapids, Michigan  
Dated: July 2, 2010

VARNUM LLP

By: /s/ Bryan R. Walters

Bryan R. Walters  
Bridgewater Place, P.O. Box 352  
Grand Rapids, MI 49501-0352  
(616) 336-6000  
[brwalters@varnumlaw.com](mailto:brwalters@varnumlaw.com)

*Attorneys for Defendant Summit Polymers,  
Inc.*

3558675\_1.DOC